

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

CAITLIN WEATHERS,

Plaintiff,

vs.

HOUSTON METHODIST HOSPITAL  
AND SUNILA ALI,

Defendants.

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CIVIL ACTION NO. 4:22-CV-04085

**SECOND JOINT MOTION AND STIPULATION TO EXTEND DEADLINES**

Pursuant to Rule VIII of this Court's Procedures, the parties respectfully request and jointly move the Court to extend the remaining deadlines in this case as set forth in the Court's Scheduling and Docket Control Order entered July 31, 2023.<sup>1</sup>

On May 22, 2023, Defendants Houston Methodist Hospital and Sunila Ali submitted their Motion for Summary Judgment, seeking to dispose of all of Plaintiff's claims.<sup>2</sup> On May 31, 2023, this Court ordered that Plaintiff file a response to Defendants' Motion for Summary Judgment on the issues of (1) whether Plaintiff's EEOC charge was timely submitted and (2) whether individual Defendant Sunila Ali is a proper party under Title VII on or before June 21, 2023.<sup>3</sup> The Court further ordered that Plaintiff file a response to the remaining arguments raised in Defendants' Motion for Summary Judgment within 21 days of any Order of the Court

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<sup>1</sup> Dkt. 44.

<sup>2</sup> Dkt. 31.

<sup>3</sup> Dkt. 33.

denying Defendants' Motion for Summary Judgment.<sup>4</sup> Plaintiff filed her response on June 21, 2023.<sup>5</sup> Defendants filed their reply on June 28, 2023.<sup>6</sup> The Court granted the Parties' Joint Motion and Stipulation to Extend Deadlines on July 31, 2023,<sup>7</sup> enabling the parties to conduct additional discovery concerning Plaintiff's claims against Defendants.

Since that time, the parties have engaged in written discovery and Defendants have noticed Plaintiff's deposition for Friday, October 13, 2023. Plaintiff has noticed the deposition of Defendant Sunila Ali for October 27, 2023. Plaintiff has also requested the deposition of Defendant Houston Methodist Hospital's corporate representative on 85 separate topics. In addition, Plaintiff states that she has endured multiple hospital stays over the last few months, which has hindered her ability to conduct discovery. Given the imminent discovery deadline on October 30, 2023, the parties seek an extension of all remaining deadlines in this case by a period of at least thirty (30) days so that the remaining depositions and written discovery in this matter may be completed.

Continuing the remaining deadlines in the July 31st Scheduling Order would not prejudice any of the parties in this case or inconvenience the Court because the parties have stipulated to extend the remaining deadlines in this matter and are unopposed to such extension. Therefore, the parties jointly request that the remaining deadlines in the Court's Scheduling and Docket Control Order entered July 31, 2023 be extended as follows:

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<sup>4</sup> *Id.*

<sup>5</sup> Dkt. 37.

<sup>6</sup> Dkt. 38.

<sup>7</sup> Dkt. 44.

Deadline	Current Date	Proposed Date
Discovery	October 30, 2023	November 29, 2023
Dispositive and Non-Dispositive Motions	November 16, 2023	December 18, 2023
Mediation	December 28, 2023	January 29, 2023
Joint Pretrial Order and Motions in Limine	April 4, 2024	May 6, 2024
Pretrial Conference	April 10, 2024	May 10, 2024
Trial	April 15, 2024	May 15, 2024

For these reasons and good cause shown, the parties request that the Court modify the scheduling order as set forth above. For the Court's convenience, a proposed form of order is submitted herewith.

Respectfully submitted,

By: /s/ Caitlin Julia Weathers (with permission)

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**CERTIFICATE OF SERVICE**

I certify that on October 6, 2023 a true and correct copy of the Parties' *Second Joint Motion and Stipulation to Extend Deadlines* was served on all counsel of record by the Court's ECF filing system.

/s/ Patrick Palmer

Patrick M. Palmer II